

WHITEMAN
OSTERMAN
& HANNA LLP

Attorneys at Law
www.woh.com

One Commerce Plaza
Albany, New York 12260
518.487.7600 phone
518.487.7777 fax

William S. Nolan
Partner
518.487.7773 phone
wnolan@woh.com

October 25, 2024

VIA EMAIL

Hon. Miroslav Lovric
United States District Court
Northern District of New York
15 Henry Street
Binghamton, New York 13901

RE: *Adirondack Trust Company v. Maha Laxmi Corp., et al.*,
No. 1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Lovric:

We are in receipt of Plaintiff's letter requesting a conference to address content added to Plaintiff's Wikipedia page under an account named "Nobbled thoroughbred." (Dkt. 111). Upon receipt of Plaintiff's letter, we immediately contacted our clients. They vehemently deny any involvement in the creation of this account or any of the content on Plaintiff's Wikipedia page.

Additionally, we want to make it unequivocally clear to the Court that at no time has anyone from my firm ever participated in, encouraged, or condoned: (1) any of the conduct that Plaintiff sets forth in today's letter, or (2) any of the conduct described in Plaintiff's pre-motion submission dated October 10, 2024. (Dkt. 103).

Thank you for your consideration.

Sincerely,

William S. Nolan

William S. Nolan

